

SECTION III—REMARKS

This Amendment is in response to the Office Action mailed October 4, 2003. Claims 1, 6, 16, 20, 24, 31 and 34 are amended herein, and claims 31-33 are canceled. Claims 1-30 and 34-36 remain pending in the application. Applicants respectfully request reconsideration of the application and allowance of all pending claims in view of the above amendments and the following remarks.

Specification Objections

The Examiner objected to the specification because it does not contain a summary of the invention. Applicants would like to kindly point out that both the M.P.E.P. and 37 C.F.R. §1.73 do not require the presence of a "Summary of the Invention" in a patent application. They merely indicate where in the application the "Summary of the Invention" should be placed if Applicants were to elect to include one. In particular, 37 C.F.R. §1.73 does not state that the Applicants "must" or "shall" include a summary, but instead only states that "[a] brief summary of the invention ... should precede the detailed description." Nonetheless, Applicants have amended the application to include a "Summary of the Invention." Applicants respectfully submit that this overcomes the Examiner's objections.

Rejections Under 35 U.S.C. § 103

The Examiner rejected claims 1-7 and 9-36 under 35 U.S.C § 103(a) as obvious in view of, and therefore unpatentable over, U.S. Patent No. 6,081,900 to Subramaniam et al ("Subramaniam") and U.S. Patent No. 6,502,135 to Munger et al ("Munger"). Additionally, the Examiner rejected claim 8 as obvious in view of Subramaniam and Munger and further in view of U.S. Patent No. 6,502,106 to Gampper et al ("Gampper").

Applicants respectfully traverse the Examiner's rejections. To establish a *prima facie* case of obviousness, three criteria must be met: (1) the prior art references must teach or suggest all the claim limitations; (2) some suggestion or motivation to combine the references must be found in the prior art; and (3) there must be a reasonable expectation of success. MPEP § 2143. As explained below, the Examiner has not established a *prima facie* case of obviousness because criteria (1) and (2) have not been met.

Subramaniam discloses a system for secure intranet access. The system includes a target server 104, a border server 106 and an external client 112. In operation, the external client requests access to confidential data stored on the target server 104. If a request is send directly to the target server, the target server determines whether the request originates outside the intranet. If the request does originate from outside the intranet, the target server re-directs the request to the border server using standard HTTP re-direct syntax. Once the request is re-directed to the border server 106, the border server authenticates the user and, if the user is authorized, the border server re-directs further requests to the target server 104.

Claim 1, as amended, recites a method combination including “receiving a request including an address, the address comprising an address of a secure server with an address of a web page concatenated thereto, and the address being at least partially encrypted.” Subramaniam do not disclose, teach or suggest a combination including the recited limitation. In particular, Subramaniam does not disclose, teach or suggest that any request sent by the external client 112—whether sent to the border server 106 or the target server 104—should include an address comprising “an address of a secure server with an address of a web page concatenated thereto, and the address being at least partially encrypted.” Munger also does not disclose a combination with the claimed limitation; Munger discloses the encryption of IP packets, but does not disclose an address having the recited limitations. Subramaniam and Munger, taken together, thus cannot disclose, teach or suggest every limitation recited in the claim.

Even if, for the sake of argument, Subramaniam and Munger did teach every element and limitation recited in the claim, they would still not obviate the claimed combination because the references provide no motivation for the combination attempted by the Examiner. Subramaniam does not disclose, teach or suggest that requests sent from the external client 112 include an address that could or should be “an address of a secure server with an address of a web page concatenated thereto, and the address being at least partially encrypted.” Subramaniam thus does not teach that such a limitation is needed or is even desirable, and therefore cannot suggest a combination Munger or any other reference which could be interpreted to disclose the noted limitation. For the above reasons, Applicants respectfully submit that claim 1 is in condition for allowance, and respectfully request withdrawal of the rejection and allowance of the claim.

Claim 16, as amended, recites a method combination including providing an intermediate unit to receive a request for a web page from a terminal, “the request including an address comprising an address of a secure server with an address of a web page concatenated thereto, and the address being at least partially encrypted.” As discussed above in connection with claim 1, Subramaniam and Munger do not disclose, teach or suggest this limitation and provide no motivation for the combination attempted by the Examiner. Applicants submit that claim 16 is therefore in condition for allowance and respectfully request withdrawal of the rejection and allowance of the claim.

Claim 20, as amended, recites a machine-readable medium having stored thereon instructions, which when executed by a processor, cause the processor to, among other things, “receive a request including an address, the address comprising an address of a secure server with an address of a web page concatenated thereto, and the address being at least partially encrypted.” As discussed above in connection with claim 1, Subramaniam and Munger do not disclose, teach or suggest this limitation and provide no motivation for the combination attempted by the Examiner. Applicants submit that claim 20 is therefore in condition for allowance and respectfully request withdrawal of the rejection and allowance of the claim.

Claim 24, as amended, recites a machine-readable medium having stored thereon instructions, which when executed by a processor, cause the processor to, among other things, “receive a request for a web page from a terminal, the request including an address, the address comprising an address of a secure server with an address of a web page concatenated thereto, and the address being at least partially encrypted.” As discussed above in connection with claim 1, Subramaniam and Munger do not disclose, teach or suggest this limitation and provide no motivation for the combination attempted by the Examiner. Applicants submit that claim 24 is therefore in condition for allowance and respectfully request withdrawal of the rejection and allowance of the claim.

Claim 28, as amended, recites an apparatus combination including a processor and a communication unit, wherein the processor and the communication unit carry out certain functions “responsive to a request from the terminal including an address comprising an address of a secure server with an address of a web page concatenated thereto, the address being at least partially encrypted.” As discussed above in connection with claim 1, Subramaniam and Munger

do not disclose, teach or suggest this limitation and provide no motivation for the combination attempted by the Examiner. Applicants submit that claim 28 is therefore in condition for allowance and respectfully request withdrawal of the rejection and allowance of the claim.

Claim 34, as amended, recites an apparatus combination including a server and an intermediate unit, wherein the server carries out certain functions “in response to a request received from the terminal, the request including an address comprising an address of a secure server with an address of a web page concatenated thereto, the address being at least partially encrypted.” As discussed above in connection with claim 1, Subramaniam and Munger do not disclose, teach or suggest this limitation and provide no motivation for the combination attempted by the Examiner. Applicants submit that claim 34 is therefore in condition for allowance and respectfully request withdrawal of the rejection and allowance of the claim.

Regarding claims 2-15, 17-19, 21-23, 25-27, 29-30 and 35-36, if an independent claim is non-obvious under 35 U.S.C. § 103, then any claim depending therefrom is also non-obvious. MPEP § 2143.03; *In re Fine*, 837 F.2d 1071 (Fed. Cir. 1988). As discussed above, claims 1, 16, 20, 24, 28 and 34 are in condition for allowance. Applicants submit that claims 2-15, 17-19, 21-23, 25-27, 29-30 and 35-36 are therefore allowable by virtue of their dependence on allowable independent claims, as well as by virtue of the features recited therein. Applicants therefore respectfully request withdrawal of the rejections and allowance of these claims.

Conclusion

Given the above amendments and accompanying remarks, all claims pending in the application are in condition for allowance. If the undersigned attorney has overlooked a teaching in any of the cited references that is relevant to allowance of the claims, the Examiner is requested to specifically point out where such teaching may be found. Further, if there are any informalities or questions that can be addressed via telephone, the Examiner is encouraged to contact the undersigned attorney at (206) 292-8600.



Charge Deposit Account

Please charge our Deposit Account No. 02-2666 for any additional fee(s) that may be due in this matter, and please credit the same deposit account for any overpayment.

Respectfully submitted,

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Date: 2-4-04

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